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Before the  
Federal Communications Commission  
Washington, D.C. 20554  
FCC Docket No. 93-119  
General Docket No. 93-40

In the Matter of

) FCC Docket No. 93-119  
) General Docket No. 93-40

Allocation of the 219-220 MHz  
Band for Use by the Amateur  
Radio Service.

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June 12, 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Federal Communications Commission

COMMENTS OF THE OREGON REGION RELAY COUNCIL

4 **Point to point requirements provide protection**

We note that limiting secondary use by the ARS to coordinated point to point operation will provide significant protection to the Automated Maritime Telecommunications Systems (AMTS). The ORRC supports this requirement as a reasonable means to provide protection to the primary user of the band.

5 **Protection of Broadcast TV channel 13**

Unlike other services, where the operators are unfamiliar with the technical characteristics of transmission equipment, ARS operators are technically sophisticated. Operators in the ARS have extensive experience with operation of transmission close to TV Broadcast

8 **Single point of contact**

We note that the AMTS has requested a single point of contact which would be responsible for protection of proprietary coordination information possessed by the AMTS service. As coordinators with similar requirements, we understand and concur with the desire to protect confidential information.

9 **Mechanisms to utilize local coordinator resources are in place and functioning**

As part of a program to support frequency coordinator participation at a regional level, the ARRL some time ago established an 800 number Bulletin Board System for frequency coordinator use. The system has built in mechanisms to protect frequency coordination information. This existing system is in place, functioning and is able to provide rapid communications between the local frequency coordinators and ARRL. ARS requests for coordination can be processed in an expeditious manner, while providing protection for the primary user of the band. The system will facilitate the utilization of local coordination resources to insure protection of the primary AMTS users of the 219-220 band.

Respectfully submitted,  
The Oregon Region Relay Council

A handwritten signature in dark ink, consisting of stylized, cursive letters that appear to be 'R P R'.